

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:) Case No. 21-09154
Iwona Zdanowicz) Chapter 13
Bryan F Green) Judge: A. Benjamin Goldgar
Debtors)

NOTICE OF MOTION AND CERTIFICATE OF SERVICE

Iwona Zdanowicz
Bryan F Green
65 Flint Dr
Barrington, IL 60010

LABELLE LAW LTD
1933 N MEACHAM RD #600
SCHAUMBURG, IL 60173

Please take notice that on March 11, 2022 at 10:30 am, a representative of this office shall appear before the Honorable Judge A. Benjamin Goldgar, or any judge sitting in that judge's place, and present the Trustee's motion & copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/join>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is **160 817 7512** and the passcode is **623389**. The meeting ID and passcode can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion without a hearing.

I certify that this office caused a copy of this notice to be delivered to the above listed debtors by depositing it in the U.S. Mail at 801 Warrenville Road, Lisle, IL and to the debtor's attorney electronically via the Court's CM/ECF system on March 04, 2022.

/s/ Glenn Stearns

FOR: Glenn Stearns, Chapter 13 Trustee

801 Warrenville Road, Suite 650
Lisle, IL 60532-4350
Ph: (630) 981-3888

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MOTION TO DISMISS FOR UNREASONABLE DELAY

Now comes Glenn Stearns, Chapter 13 Trustee, and requests dismissal of the above case pursuant to 11 U.S.C. Section 1307 (c) and in support thereof, states the following:

1. The Debtors filed a petition under Chapter 13 on Friday, July 30, 2021.
2. The Debtors have failed to:
 - a. File an amended plan.
 - b. File an amended Form 122C-2.
3. As a result, the Debtors have failed to comply with the Bankruptcy Code and have caused an unreasonable delay that is prejudicial to creditors.

WHEREFORE, the Trustee prays this case be dismissed for cause pursuant to Section 1307 (c).

Glenn Stearns, Chapter 13 Trustee
801 Warrenville Road, Suite 650
Lisle, IL 60532-4350

Respectfully Submitted;

/s/ Glenn Stearns

FOR: Glenn Stearns, Chapter 13 Trustee